

Arnold E. Reiter, Esq. (6121983)
Reiter Law Firm
135 Chestnut Ridge Road, Suite 200
Montvale, New Jersey 07645
(845) 357-2215
Attorney for Plaintiff,
Stanley Markowitz

-----X
STANLEY MARKOWITZ,

Plaintiff,

vs.

COSTCO WHOLESALE CORPORATION,

Defendant.
-----X

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION: BERGEN COUNTY

Docket No.:

Civil Action

COMPLAINT

Plaintiff, STANLEY MARKOWITZ, through his attorney, Arnold E. Reiter, Esq. of Reiter Law Firm, complaining of Defendant, COSTCO WHOLESALE CORPORATION, respectfully alleges:

1. At all times herein mentioned Defendant was and still is engaged in conducting and operating a wholesale store at 2 Teterboro Landing Drive, Teterboro, New Jersey 07608.
2. At all times herein mentioned the Plaintiff, STANLEY MARKOWITZ, was a patron of the Defendant at the time of Defendant's alleged negligence and Plaintiff's injury.
3. On or about December 3, 2020, Plaintiff, STANLEY MARKOWITZ, entered and utilized the services of the Defendant.

4. On that same date—December 3, 2020, Plaintiff was caused to be hurt and injured by reason of the negligence of the Defendant, its agents, servants, and employees, as hereinafter alleged.

5. The accident and the resulting injuries to the Plaintiff, STANLEY MARKOWITZ, were caused by reason of the negligence of the Defendant.

6. Defendant, its agents, servants, or employees, were negligent in that they caused, allowed, and permitted their premises to become and remain in a defective, dangerous, improper, and negligent condition.

7. Defendant failed to take reasonable care or any precaution for the safety of the Plaintiff and other patrons at the store in that Defendant caused, allowed, and permitted certain stanchions of said establishment for the use as a border or boundary for the shopping carts used at Costco to become and remain in a defective, dangerous, and otherwise negligent condition so that as Plaintiff was lawfully in and upon the negligent condition caused the Plaintiff to slip and fall, sustaining the injuries hereinafter alleged; and that Defendant was otherwise negligent in the circumstances.

8. By reason of the premises, Plaintiff, STANLEY MARKOWITZ, was severely and seriously injured. Upon information and belief, as a result of his slip, Plaintiff fell, hurt his knee and broke his hand immediately thereafter.

7. Upon information and belief, Plaintiff suffered and will continue to suffer pain and injury; and, upon information and belief, will be permanently injured; that he has been compelled

to expend sums of money and incur liability for medical care and treatment; that he has undergone orthopedic treatments including the placement of a splint and a cast on his left hand. Upon information and belief, Plaintiff will be required to commit to treatment in the future at significant cost, pain and suffering.

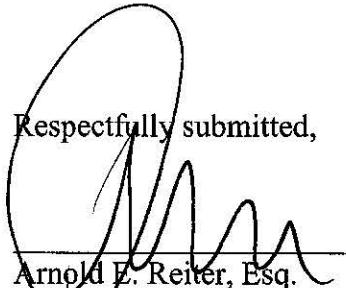
8. That by reason of the foregoing, the Plaintiff, STANLEY MARKOWITZ, has suffered damages in an amount to be determined upon the trial of this action.

9. The amount of damages sought in this action exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiff demands judgment against Defendant in an amount to be determined upon the trial of this action, but in a sum not less than one million (\$1,000,000) dollars together with the costs and disbursements of this action.

Dated: April 20, 2021

Respectfully submitted,



Arnold E. Reiter, Esq.

REITER LAW FIRM

Attorneys for Plaintiff

135 Chestnut Ridge Road, Suite #200

Montvale, New Jersey 07645

DEMAND FOR TRIAL BY JURY

PLEASE TAKE NOTICE, that Plaintiff demands a trial of the issues by a jury.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

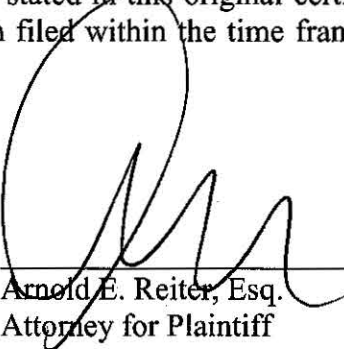
Pursuant to R. 4:10-2(b), demand is made upon each defendant that it disclose to plaintiff's counsel whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy or all of a judgment which may be entered in this action or indemnify or reimburse such defendant for payments to satisfy any judgment rendered herein and, provide plaintiff's counsel with those insurance agreements or policies, including, but not limited to all and any declaration sheets. This demand shall include not only primary coverage, but also all and any excess, catastrophe and umbrella policies.

CERTIFICATION OF NO OTHER ACTIONS

Pursuant to Rule 4:5-1, it is hereby stated that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, I know of no other parties that should be joined in the above action. In addition, I recognize the continuing obligation of each party to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification. I further certify that this Answer and Counterclaim has been filed within the time frame as required by law, as extended by consent of the parties.

Dated: April 20, 2021

By:



Arnold E. Reiter, Esq.
Attorney for Plaintiff

SUMMONS

Attorney(s) Arnold E. Reiter, Esq. (6121983)

Office Address 135 Chestnut Ridge Road, Suite 200

Town, State, Zip Code Montvale, New Jersey 07645

Telephone Number (845) 357-2215

Attorney(s) for Plaintiff Stanley Markowitz

STANLEY MARKOWITZ,

Plaintiff(s)

vs.

COSTCO WHOLESALE CORP.,

Defendant(s)

Superior Court of New Jersey

Bergen ☐ County

Law Division

Docket No: _____

CIVIL ACTION SUMMONS

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.

Clerk of the Superior Court

DATED: April 20, 2021

Name of Defendant to Be Served: COSTCO WHOLESALE CORPORATION

Address of Defendant to Be Served: 2 Teterboro Landing Drive, Teterboro, New Jersey 07608

Civil Case Information Statement

Case Details: BERGEN | Civil Part Docket# L-002645-21

Case Caption: MARKOWITZ STANLEY VS COSTCO

WHOLESALE COR PORATI

Case Initiation Date: 04/21/2021

Attorney Name: ARNOLD E REITER

Firm Name: REITER LAW FIRM

Address: 75 MONTEBELLO RD

SUFFERN NY 10901

Phone: 8453572215

Name of Party: PLAINTIFF : Markowitz, Stanley

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: Stanley Markowitz? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

04/21/2021

Dated

/s/ ARNOLD E REITER

Signed